

Michael A. Battle  
William R. Martin (admitted *pro hac vice*)  
Michelle N. Bradford (admitted *pro hac vice*)  
David S. Slovick  
Erin C. Steele (admitted *pro hac vice*)  
BARNES & THORNBURG LLP  
555 12th Street NW, Suite 1200  
Washington, DC 20004-1275  
mbattle@btlaw.com  
(202) 371-6350  
billy.martin@btlaw.com  
(202) 371-6363  
mbradford@btlaw.com  
(202) 408-6922  
dslovick@btlaw.com  
(646) 746-2019  
esteele@btlaw.com  
(202) 408-6932

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**UNITED STATES OF AMERICA**

v.

**JAMES VELISSARIS,**

**Defendant.**

**No. 1:22-cr-00105-DLC**

**Hon. Denise L. Cote**

**DEFENDANT'S MOTION FOR  
RELEASE PENDING APPEAL**

PLEASE TAKE NOTICE that, pursuant to 18 U.S.C. § 3143(b), Defendant James Velissaris will move the Court for an order granting this Motion for Release Pending Appeal in the above-captioned matter at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., Courtroom 18B, New York, NY 10007-1312, on a date and time designated by the Court. Contemporaneously with this Motion, Mr. Velissaris submits a Memorandum of Law in Support of his Motion for Release Pending Appeal, dated April 19, 2023.

Dated: New York, New York  
April 19, 2023

Respectfully submitted,  
/s/ Michael A. Battle

Michael A. Battle (SDNY Bar Code No. MB9289)  
William R. Martin (admitted *pro hac vice*)  
Michelle N. Bradford (admitted *pro hac vice*)  
Erin C. Steele (*pro hac vice* pending)  
BARNES & THORNBURG LLP  
555 12th Street NW, Suite 500  
Washington, DC 20004  
mbattle@btlaw.com  
(202) 371-6350  
billy.martin@btlaw.com  
(202) 371-6363  
mbradford@btlaw.com  
(202) 408-6922  
esteele@btlaw.com  
(202) 408-6932

- and -

/s/ David Slovick

David Slovick  
BARNES & THORNBURG LLP  
390 Madison Ave.  
12th Floor  
New York, NY 10017  
david.slovick@btlaw.com  
(646) 746-2019

*Attorneys for Defendant James Velissaris*